

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

**DECLARATION OF KRISTIN E. BENDER
IN SUPPORT OF MOTION FOR PROTECTIVE ORDER**

I, Kristin E. Bender, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Willkie Farr & Gallagher LLP, 1875 K Street NW, Washington, DC 20006, and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Motion for a Protective Order.

3. On June 13, 2025, I met and conferred with counsel for the Wayfarer Parties, together with other counsel for Ms. Lively. During the conferral, counsel for the Wayfarer Parties insisted that Ms. Lively's deposition proceed first.

4. Ms. Lively agreed to be the first deponent, and offered July 17, 2025 for the date of her deposition. Counsel for the Wayfarer Parties accepted this date.

5. A true and correct copy of email correspondence between counsel for Ms. Lively and counsel for the Wayfarer Parties regarding Ms. Lively's July 17, 2025 deposition is attached hereto as **Exhibit A**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 11, 2025

s/ Kristin E. Bender
WILLKIE FARR & GALLAGHER LLP
Kristin E. Bender
1875 K Street NW
Washington, DC 20006
(202) 303-1000
kbender@willkie.com

Counsel for Blake Lively